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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION

IN RE:	§	CASE NO. 13-10215-rlj-13
	§	
Verna Sherrell Hitchcock	§	
	§	
	§	
DEBTOR	§	CHAPTER 13

**DEBTOR'S MOTION TO EXTEND THE AUTOMATIC STAY**  
**AND REQUEST FOR INTERIM RELIEF**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Verna Sherrell Hitchcock, (herein "Debtor"), and files this Motion to Extend the Automatic Stay and Request for Interim Relief, and, in support thereof, would show the court as follows:

1. Debtor filed this Chapter 13 case on 8/23/2013, in the Northern District of Texas, Abilene Division.
2. Debtor filed a prior Chapter 13 Bankruptcy case, Case No. 10-10176-rlj-13, in the Northern District of Texas, Abilene Division on 5/27/2010, and said case was dismissed without prejudice on 7/31/2013, for failure to make timely payments to the Chapter 13 Trustee.
3. As a result of the Debtor's previous bankruptcy case pending within the one year period before Debtor's current Chapter 13 Case was filed and pursuant to the provisions of 11 U.S.C. §362(c)(3)(A), the automatic stay will terminate on the 30th day after filing Debtor's current Chapter 13 case
4. Debtor will show this court the filing of the current Chapter 13 case is filed in good faith as to the creditors stayed.

5. The Court's next regular general docket to consider such a motion is on 10/2/2013, (more than 30 days after the filing of the motion).
6. Unless the Court hears the Debtor's Motion to Extend the Automatic Stay on its 10/2/2013, docket, it will be necessary to schedule a "special setting" to comply with the 30 day requirement of 11 U.S.C. §362(c)(3)(B). Debtor requests the court to grant the Motion to Extend the Automatic Stay on an interim basis until the Motion can be heard on the 10/2/2013, docket.
7. If the Court grants the relief requested, Debtors' counsel will mail notice of the Motion to Extend the Automatic Stay and Request for Interim Relief to all creditors.
8. After a hearing on the motion, Debtor requests this Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. §1362(c)(1), 11 U.S.C. §361(c)(2), or a Motion for Relief is granted under 11 U.S.C. §362 (d) and for such further relief to which Debtor(s) may be justly entitled.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that the Court extend the automatic stay on an interim basis until hearing can be held on the Court's regular docket on 10/2/2013, and after such hearing prays the Court enter an Order continuing the Automatic Stay to all creditors for the duration of this Chapter 13 proceeding until such time the Automatic Stay is terminated under 11 U.S.C. §1362(c)(1), 11 U.S.C. §362(d)(2) or a Motion for Relief is granted under 11 U.S.C. §362(d), and for such other relief at law and equity to which the Debtor may be entitled.

Respectfully submitted,

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By: /s/ Monte J. White  
SBN 00785232  
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing *Motion to Extend the Automatic Stay* was served on August 27, 2013 to the following parties by ECF and/or regular First Class mail:

/s/Monte J. White  
Attorney for Debtors

Acs/abilene Higher Edu  
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Hendrick Medical Center  
Collection Department  
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Service Bureau Inc  
2705 81st St  
Lubbock, TX 79423

Afni, Inc.  
Attn: DP Recovery Support  
PO Box 3427  
Bloomington, IL 61702

HMC Physicians  
303 N. Clyde Morris Blvd.  
Daytona Beach, FL 32114

Southwestern Bell  
Collections Division  
PO Box 90245  
Arlington, TX 76004

Asset Acceptance  
PO Box 2036  
Warren, MI 48090

Internal Revenue Service  
PO Box 21126  
Philadelphia, PA 19114

Sprint  
PO Box 79357  
City of Industry, CA 91716-9357

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IRS Special Procedures  
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Dallas, TX 75242

SuddenLink  
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MetroCare Services - Abilene  
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National Bankruptcy Center  
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